

Matthew Corso

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*Attorneys for Defendants*, CPL (LINWOOD) LLC d/b/a Linwood Care Center (improperly pled as Linwood Care Center) and Revera Health Systems, Inc. (improperly pled as Revera Health Systems)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY – CAMDEN VICINAGE**

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**MARTIN KRATZ, EXECUTOR** :

**For the Estate of GLADYS KRATZ,** :

**Deceased, and MARTIN KRATZ,** :

**Individually,** :

*Plaintiff* :

*v.* :

**LINWOOD CARE CENTER, REVERA** :

**HEALTH SYSTEMS, ABC, INC. (1-10);** :

**JOHN DOE, (1-10) and JANE DOE,** :

**R.N. (1-10) said names, ABC, Inc.** :

**John Doe and Jane Doe, being fictitious,** :

**Jointly, individually, and in the** :

**alternative,** :

**Defendants** :

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**CIVIL ACTION**

**NO. 1:15-CV-02906-JHR-JS**

**HON. JOEL SCHNEIDER, U.S.M.J.**

**NOTICE OF MOTION  
TO COMPEL DISCOVERY**

TO: Sherri Warfel, Esq.  
Pellettieri, Rabstein & Altman  
100 Nassau Park Boulevard, Suite 111  
Princeton, NJ 08540

**PLEASE TAKE NOTICE** that on Monday, December 7, 2015 at 10:00 a.m., or thereafter as soon as counsel may be heard, Defendants CPL (LINWOOD) LLC d/b/a Linwood Care Center (improperly pled as Linwood Care Center) and Revera Health Systems, Inc. (improperly pled as Revera Health Systems) (hereinafter “Defendants”) will move before The

Honorable Joel Schneider, U.S.M.J. at the United States Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, for an Order compelling Plaintiff, Martin Kratz ("Plaintiff") to respond to Defendants' Initial Discovery Requests. Defendants' Motion is made pursuant to this Court's Order dated October 27, 2015, which required responses to Defendants' Initial Discovery Requests by November 10, 2015, and Rule 37(a)(3)(B)(iii) and (iv) of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion Defendants rely upon the concurrently submitted Certification of Matthew Corso.

In accordance with Local Rule 7.1(e), a proposed order is submitted herewith.

Respectfully submitted,

/s/ Matthew Corso

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*Attorneys for Defendants CPL (LINWOOD)  
LLC d/b/a Linwood Care Center  
(improperly pled as Linwood Care Center)  
and Revera Health Systems, Inc.  
(improperly pled as Revera Health Systems)*

Dated: November 13, 2015